

REFORM UK

**Internal investigation into matters arising from the
Channel 4 News and Verbatim broadcast of 3 September
2026**

REPORT

7 October 2026

Contents

Introduction

Executive summary

1. The approach and the building of trust

2. The polling arrangements

3. Proposals that were not pursued

4. The proposed contribution

5. The meetings of 27 and 28 July

6. The broadcast

7. Assessment

8. Conduct

9. Recommendations

10. Conclusions

Introduction

1. On 3 September 2026 Channel 4 News broadcast a report, and the investigative group Verbatim published a film, based on recordings made over almost a year by an undercover actor using the name William Lockwood. The report alleged that senior figures at Reform UK had arranged for three opinion polls, published in national newspapers, to be paid for by an American company; that those payments were donations to the party from an impermissible source which the party had failed to declare or return; and that senior figures had made plans for a further donation of £500,000 to reach the party from an American father through his British-resident son. It alleged that Nigel Farage was aware of these arrangements.
2. Reform UK commissioned this investigation to establish what happened, to assess the allegations against the material available to the party, and to identify what should change.
3. The investigation has considered the accounts of James Orr, a consultant acting as the party's Head of Policy, and Dan Jukes, who acted for the party as a consultant dealing with a range of matters and communications until September 2026; contemporaneous messages with the actor and with each other, covering the whole period from September 2025 to August 2026; the broadcast and the film; the correspondence sent by Channel 4 News and Verbatim before publication; the party's own financial and administrative records; and the public statements made since the broadcast by JL Partners, The Telegraph and The Times.
4. Where the investigation states a finding, it does so because the material supports it. Where the material does not permit a finding, the report says so rather than supplying one. Recorded remarks are quoted as they were made, and the report does not soften them. Explanations offered by those who made them are recorded as their explanations.
5. Two matters are outside the scope of this report. Since the broadcast, the British Polling Council has opened an inquiry into the disclosure of the commissioning of the polls, and a police investigation has been announced. Both concern questions which those bodies, and not the party, will determine. This report does not seek to anticipate them. It is confined to what the party can establish from the material available to it, and to what the party should do as a result.
6. The actor is referred to throughout by the name he used. Other individuals are referred to by surname.

Executive summary

7. **Reform UK did not commission any of the three opinion polls.** It did not contract for them, was not quoted for them, was not invoiced for them and made no payment for them. It holds no record of any of those things. The polls were commissioned by Mr Jukes, a contractor with several clients other than Reform UK

and an independent commercial relationship with the polling company, on his own account and at his own risk. The findings of each poll, and the underlying tables, entered the public domain on publication. Nothing was supplied to the party before publication or beyond what was published.

8. **The payments made to JL Partners were therefore not donations to Reform UK within the meaning of the Political Parties, Elections and Referendums Act 2000.** No expense of the party was discharged, no property, services or facilities were provided to the party, and no research organised by or on behalf of the party was sponsored. Nothing was received by the party, and nothing was accepted by it. The provisions governing the acceptance, return and reporting of donations were not engaged.
9. **The proposed contribution of £500,000 did not take place.** The proposal originated with the actor. The figure was his. He pressed repeatedly for a meeting with the party leader. Nothing was agreed, no donations were made and no formal position was presented to the party's finance team, and nothing was accepted. The party's procedures for checking the identity of a donor and the source of funds never engaged, because nothing reached them.
10. **The investigation has found no basis for the suggestion that any supporter of the party has donated via their children.** In the conversation where Mr Jukes says to the actor that other supporters had given in this way, he was stating something he did not know to be true. It is a serious remark and no circumstance tempers it, but the fact remains that Reform UK has not accepted donations in this manner. The investigation also recognises the potential consequences in naming individuals who have done nothing wrong and the suggestion that they have, to the actor, notwithstanding that the individual's identities were not broadcast.
11. **The investigation has found no breach of electoral law by Reform UK.** It has found no evidence that any individual knowingly entered into, or acted in furtherance of, an arrangement to facilitate a donation from an impermissible source. It has found conduct which deserves criticism and it has criticised it. And it has found weaknesses in the party's arrangements which allowed a sustained deception to reach the top of the party without anyone asking the questions that would have exposed it, and it has set out how those weaknesses are to be closed.
12. **The investigation found no evidence that Mr Farage knew how three polls had been paid for six months earlier.** Nothing in the material shows that the arrangements for paying for the polls were explained to Mr Farage at any time before a lunch in his constituency on 28 July 2026. The accounts of the two men who dealt with him are to the same effect. The exchanges at that lunch were brief and social, took place during a by-election in which he was the candidate, and were initiated by his visitors.
13. **The undercover operation did not begin with Reform UK.** It began in September 2025 by approaching an individual who then held no announced role in the party. Trust was established by a real payment to a policy institute, and was maintained

for eleven months by a consistent and documented account, repeated social contact and, when a face was required, an actor. The actor asked for confidentiality about his own affairs before anyone offered it to him.

14. **The broadcast severely lacked journalistic balance.** On four occasions between October 2025 and March 2026 proposals for support were considered but were prevented from progressing by Reform figures because they were not within the rules. Three of them were dropped by the person (Mr Orr) who is accused of looking for ways around the rules, on the ground that they might amount to a declarable donation. One was routed instead to an existing supporter, who made the payment and declared it.
15. **The broadcast conveyed a distorted version of events.** The broadcast placed conversations recorded months apart alongside one another, presented remarks about a proposal that was abandoned as if they described payments that were made, and omitted the occasions on which proposals were dropped. The effect was to present a year of separate events as a single scheme. The investigation does not speculate about why the programme was made in that way. It records the effect on meaning.
16. **The investigation makes seven recommendations on improving internal procedures.** Several things said during the year by the party's then Head of Policy and its then communications consultant were wrong. They should not have been said, are set out in full in this report and they are not defended. The seven recommendations concern the point at which prospective donors are referred to the party's Treasury, the commissioning of research by people connected with the party, the terms on which contractors are engaged, conduct in dealings with prospective donors, the declaration of hospitality and overseas visits, the handling of unsolicited approaches, and the implementation of these changes.

1. The approach and the building of trust

17. The operation did not begin with Reform UK. It began with an individual, and it began before he held any announced position in the party.
18. On 4 September 2025 a man calling himself William Lockwood approached James Orr at the National Conservatism Conference in Washington DC. At that date Mr Orr held no formal role with Reform UK. He sat on the organising committee of the conference and chaired the advisory board of the Centre for a Better Britain, a policy institute publicly understood to be sympathetic to the party but without any direct associations. At this stage Orr had no formal association with Reform UK.
19. The approach was made on the footing that Lockwood represented a private family office interested in philanthropic support for political projects in the United Kingdom. He asked first about funding work on academic freedom and free speech. Mr Orr discouraged that, on the basis that the legislative argument had largely been won. The conversation turned to the Centre for a Better Britain, and Mr Orr agreed to make an introduction.

20. The following day Lockwood wrote offering support and asking who he should deal with. Mr Orr replied that he could handle it. Lockwood proposed £5,000. On 23 September 2025 he confirmed that the payment to the Centre had been made.
21. That payment is the foundation of everything that followed. An offer of money establishes nothing. Money actually paid, to a real organisation, on the terms offered, establishes a great deal. From that point Lockwood was a person who had said he would give and had given.
22. Mr Orr took up his role with Reform UK on 10 October 2025. On 15 October the two men had lunch at Rules. The account Lockwood gave at that lunch, and maintained without material variation for the following eleven months, was as follows:
- The family's money had been made in commodities in sub-Saharan Africa. It was held through a family office. He and his father were equal partners in it and decided unanimously. His father was reluctant to be associated publicly with Reform UK because of the reputational risk and needed persuading to do so. This element is key to how the footage was later framed. Lockwood himself presented as British, British-educated, London-based and married.
23. On 20 October Mr Orr put forward a proposal for support of £50,000 a month until the local elections in May. Lockwood replied that this *"would need to be signed off by our principals back in the US"*. On 24 October he reported that sign-off had been given. Mr Orr's response was to ask for information:
- "Could you give me some info and background on your family office and business? Sorry: we have to do some due diligence at our end."*
24. On 27 October Lockwood sent a password-protected investor overview document, writing:
- "I know this goes without saying, but this is new territory for us, so please do treat this with utmost discretion. We prioritize confidentiality in our business, so this information is not something we distribute broadly."*
25. That request for discretion was made by the actor, at the outset, and it framed everything afterwards. A prospective supporter who asks for confidentiality about his own affairs is unremarkable. The investigation has found no instance in which anyone at the party sought secrecy that the actor had not first sought for himself.
26. The October proposal did not proceed. On 14 November Mr Orr told Lockwood:
- "Sorry the project I had in mind didn't come off - funding is flowing fast for us now thankfully and it was decided that it would be more prudent to use party funds."*
27. On 20 November Lockwood was given a tour of the party's offices, followed by lunch. Mr Orr's account, which the contemporaneous messages support, is that he set out the position in binary terms: a person either donates to a political party and is declared or does not donate.

28. He then suggested things Lockwood might support which had nothing to do with the party, including a policy institute, think tanks or an independent publication or assistance in his other endeavours outside of Reform UK through a social media manager. Mr Orr raised, unprompted, that the last of these might be capable of being construed as a benefit in kind to the party because of his own public association with it, and it was not pursued.
29. The relationship continued for a further nine months. Lockwood was invited to receptions and to party events. In May 2026 he travelled to Hay-on-Wye to attend a panel at which Mr Orr was speaking, and was invited to join Mr Orr, his wife and his daughter for supper afterwards. In June he attended a party dinner for supporters and, separately, a supporter's summer party. He was introduced to other people connected with the party. In July an actor was engaged to play his father and was presented as such at two meetings.
30. The investigation records these matters not to excuse what was said during the period but to explain the conditions in which it was said. This was not a single approach by a stranger. It was a sustained operation, running for almost a year, which began by establishing good faith with a real payment to a real organisation, which maintained a consistent and documented account, which asked for confidentiality on its own behalf before any was offered to it, and which was prepared to hire an actor to sustain the deception when a face was required. The people dealing with Lockwood believed they were dealing with a supporter who had already given. They were wrong, and they were wrong because they were deliberately deceived.

2. The polling arrangements

The three polls

31. Three opinion polls are in issue. The first, on public attitudes to the postponement of the May 2026 local elections, was conducted by JL Partners and reported by The Telegraph on 16 January 2026. The second, on attitudes to the Prime Minister, was reported by The Telegraph on 10 April 2026. The third, on support for political parties among trade union members, was reported by The Times on 1 June 2026. JL Partners invoiced £18,000, £4,500 and £10,000 respectively to a United States company, IL Office LLC, which paid each invoice. That company, as Channel 4 News has since stated, was set up and controlled by Verbatim. The wealthy American whose money it was said to be did not exist.

Who commissioned them

32. Mr Jukes's evidence is that he chose the questions and approved the costs. No one at Reform UK was asked to approve either. If the external payer had not met the invoice, the cost would have fallen on him. The party was never privy to a contract was never going to be invoiced and was never going to pay. In his words, there was no contract between Reform and JL Partners and this accords with the internal documentation within Reform UK.

33. The investigation considers that based on his evidence, Mr Jukes commissioned all three polls personally. He describes his own position in these terms. He had no staff contract, no job title and no job description with the party he assisted across a range of matters having undertaken communication support for Mr Farage for many years prior. He regards himself as a free agent, operating through a limited company, and over the past few years he has had a number of clients to whom he has provided advice on communications, public relations and social media, most of them outside politics. His relationship with Mr Johnson he describes as both a friendly and a business one.
34. His account of why the polls were structured as they were is this: He approached Mr Johnson, whom he describes as a friend, to arrange it. The investigation accepts that account. That the subject of a poll arises in discussion within a party does not make the party the commissioning client. The decision to commission, the questions, the cost and the liability were his as a matter of sense and law.
35. His understanding at the time was that, under the rules of the British Polling Council, the person who pays for a poll is treated as its commissioner. The investigation records it as his understanding rather than as the rule. It explains, however, why he regarded the arrangement as one in which the poll would stand as JL Partners' own, and why, as he told the investigation, it never crossed his mind that the arrangement could be a donation to the party. He did not ask the party for advice on the point for that reason.
36. Mr Jukes was engaged by Reform UK as a contractor. He was not an employee. He has commissioned polling for other clients, and he had a working relationship with JL Partners and its co-founder James Johnson which extended beyond any of them. In December 2025 he attended a JL Partners staff retreat in Egypt as a guest speaker, with his travel and accommodation met by the company. JL Partners has said publicly that he attended in a personal capacity. The party has said the same. The investigation accepts both statements. Whatever else may be said about that trip, it is evidence of a commercial relationship between Mr Jukes and the pollster that existed independently of the party and predated the first of the polls.
37. Mr Jukes is a committed supporter of Reform UK and has never pretended otherwise. That does not alter the capacity in which he acted. A contractor who is also a supporter is still a contractor, and enthusiasm for a party's success does not convert work he placed on his own account into work placed on the party's behalf.
38. The account given by Mr Johnson on the broadcast is consistent with this. Describing the first poll, he said:

"Dan gave me a call and said, look, we want to do this polling of councils to show X. Can you guys do this? Gave them three options of quotes. We came back, asked for a slightly bespoke thing, we came back and then we just went and did it. Kept him in the loop. He's always been my main contact in Reform, Dan."

The commission came from Mr Jukes. The narrator drew the same conclusion, saying that it was:

“not James Orr but Dan Jukes who actually commissioned the poll”.

That Mr Johnson knew Mr Jukes as his contact at Reform describes their acquaintance. It does not describe the capacity in which any particular instruction was given, and Mr Jukes’s evidence, corroborated by his independent relationship with the firm, is that these instructions were his own.

39. As part of this investigation the party’s records have been searched. There is no purchase order, no request for approval, no quotation, no invoice, no payment and no correspondence with JL Partners about any of the three polls. That is what one would expect if the party was not the client, and it is what the search found.

Who paid, and how the payers were found

40. Mr Orr’s role was to find people willing to meet the cost. On 5 January 2026 he wrote to Lockwood:

“An opportunity has arisen that I think might pique your interest.”

41. At Mark’s Club on 12 January he told Lockwood that a poll had been arranged, that it would cost £18,000 plus VAT, and that Lockwood could support it.

42. On 15 January Lockwood replied:

“Had the chance to discuss our project - reception very positive, we’re minded to proceed.”

43. On 21 January he supplied the details of the paying entity. The invoice was sent to it by JL Partners on 22 January.

44. On 16 January, the day the first poll was published, Mr Jukes wrote to Mr Orr:

“Fun bits aside - how shall we get the payment done? JL were asking me etc.”

45. It was to Mr Jukes, and not to the party, that the pollster looked for payment. That is consistent with his account of where the liability lay.

46. On 9 April Mr Jukes wrote to Mr Orr: *“I have another poll that needs paying for. Approx £5k.”* Mr Orr replied that he would *“get the funds arranged from someone tomorrow”*. Mr Jukes suggested Lockwood. Lockwood agreed the following day, and the invoice for £4,500 was paid at the end of the month. In May Mr Orr told Mr Jukes that funding for two further polls had been arranged, one to be met by an existing supporter of the party. On 9 June Lockwood offered to meet one invoice and Mr Orr replied: *“Please thank your father. I’ll get James to invoice you for the Times one.”* The invoice for £10,000 was issued the following day.

47. A feature of this sequence matters, namely in each case the poll had been conducted and published before any payer was confirmed. The work was not done because a payer had been secured; a payer was found after the work was done.

What the party received

48. The findings of each poll were published in a national newspaper. The data tables were published by JL Partners, in accordance with the practice of the British Polling Council, which requires its members to place tables on their website within two working days of publication. Nothing was supplied to the party in advance of publication. Nothing was supplied to the party beyond what was published. Mr Jukes's account is to the same effect: *"We didn't gain any data that wasn't put into the public domain."*
49. The party welcomed the results and said so. On 16 January Mr Orr wrote to Lockwood: *"Bullseye!!! More detail to come - but the polling results were better than we could have dreamed. Nigel is over the moon."*
50. Senior figures shared the published findings on social media, as any party would. On 16 February, after the Government abandoned its plan to postpone the elections, he wrote: *"Your financial backing of that poll was a huge part of our campaign, so thank you. Gave us massive momentum and public credibility."*
51. The campaign referred to was the public campaign against the postponement, which the party had led and which included its application for judicial review. A published poll showing that 84 per cent of those asked opposed the postponement was part of the public argument. Welcoming a published finding, and using it in public debate, is not the receipt of a service the results were beneficial to many parties, not simply Reform UK.

Disclosure of the commissioning client

52. Neither newspaper was told who had commissioned the polls. The rules of the British Polling Council require a member, when findings enter the public domain, to disclose the client. That obligation rests on the pollster.
53. On the broadcast Mr Johnson acknowledged that the client should have been disclosed and was not. Since the broadcast JL Partners has said that, while there is no concern about the accuracy of its work, the report *"did reveal weaknesses in our procedures"*, and that it is reviewing them *"to eliminate possible grey areas and ambiguities"*. The Telegraph has said it believes it was misled and has suspended the articles while the British Polling Council conducts a review. The Times has said it was not made aware of the commissioning and payment arrangements.
54. The investigation makes no finding about the pollster's compliance with its professional obligations, which is a matter for them. It records that the obligation of disclosure was not the party's and that the party was not the client. It also records, because it is true, that the people dealing with Lockwood understood that neither he nor the party would be publicly associated with the polls, and that Mr Jukes described the arrangement in terms which the section of this report on conduct sets out.

Findings

55. Reform UK did not commission any of the three polls, did not contract for them, was not quoted or invoiced for them and did not pay for them. The commissions were placed by a contractor on his own account and at his own risk, in the course of a commercial relationship with the pollster that existed independently of the party. The party incurred no liability. Nothing was supplied to the party before publication. The party's interest was in findings that anyone could read.

3. Proposals that were not pursued

56. The broadcast presented the year as a sequence of arrangements that were made. It was as much a sequence of arrangements that were not. On four occasions between October 2025 and March 2026 a proposal for support was considered and not pursued. Three of them were dropped by Mr Orr. The investigation sets them out together because their significance lies in the pattern.

October and November 2025: the monthly programme

57. The £50,000 a month proposal put forward on 20 October 2025 was not pursued. Mr Orr had asked for background on the family office in order to carry out due diligence. Before that process went further, the proposal was dropped. His message of 14 November records the reason given at the time: it had been decided to use party funds. No money changed hands.

November 2025: support for social media work

58. At lunch on 20 November Mr Orr suggested things Lockwood might fund which had nothing to do with the party. One was assistance with Mr Orr's own social media. He raised at the time, without prompting, that because his public profile identified him with the party, payment for that work might be construed as an indirect benefit to it. The suggestion was not taken forward. The investigation regards this episode as a clear contemporaneous indication of Mr Orr's awareness of the risk of benefits in kind, at a point months before any poll had been discussed.

February 2026: the research proposal

59. On 5 February Mr Orr wrote to Lockwood:

"I have another proposal for you. Same sort of idea as before with a slightly higher price tag (£30k + VAT). There is a legal snag this time though we would need to check to ensure it's compliant with disclosure rules. Maybe it's something you could run past your lawyer."

60. The proposal concerned research to inform the party's own policy work. Mr Orr raised it within the party that day. On 7 February he wrote:

“Unfortunately the compliance/legal analysis means my idea is not going to work given your constraints so I’ve had to ask an existing donor to make a donation in kind. But there will be other opportunities.”

61. It is important to note the ‘constraints’ Mr Orr refers to are those presented by the journalist as part of the deception, namely there can be no public association between his father and Reform UK. The distinction applied was between polling for publication, the results of which are available to everyone, and research for the party’s own use, which is of benefit to the party alone. The first was treated as something Lockwood could support without becoming a donor. The second was treated as a donation in kind which would have to be declared, and which Lockwood, who did not wish to be declared, could therefore not fund. The proposal was routed to an existing supporter of the party, who paid for the research and declared it.
62. The investigation attaches weight to this episode for three reasons. Mr Orr identified the problem himself. He raised it within the party rather than resolving it alone. That is not the conduct of a person seeking ways around the rules. It is the conduct of a person applying them, on the understanding he had of them, even when it was inconvenient to do so.

March 2026: the proposal at Claridge’s

63. On 31 March Mr Orr and Lockwood met at Claridge’s. A further proposal was discussed. Mr Orr is recorded as saying of it that:

“if there’s any way of seeing it, it would technically be a donation in kind”.

64. The proposal was not commissioned. No payment was made. The broadcast itself acknowledged that *“this scheme doesn’t come off”*. The remarks made at that meeting are set out and criticised in the section of this report on conduct. The investigation records here that the proposal to which they related was abandoned, and that Mr Orr’s own characterisation of it at the time was that it would be a donation in kind – whatever that proposal was and whomever suggested it. It is hard to conceive of this having come from Mr Orr whose view is that it would not work legally but we do not have sufficient clear evidence on this point.

Findings

65. Even though neither Mr Orr nor Mr Jukes recollections are exact as events occurred over the course of a year, a consistent distinction was drawn throughout that period between published polling and research for the party’s own use, and it was applied in practice. Where a proposal fell on the wrong side of that distinction it was dropped, or it was routed to another supporter and declared. It was applied consistently, it was applied by the people now accused of ignoring it, and on the one occasion when it required a declaration to be made, the declaration was made.

4. The proposed contribution

66. Before turning to the proposed contribution it is necessary to explain how a donation to Reform UK is accepted, because the allegation assumes that the people who spoke to Lockwood were in a position to accept one. They were not.
67. The law places responsibility for donations on a party's registered Treasurer. When a donation is received, the Treasurer must take all reasonable steps to verify the identity of the donor and whether the donor is a permissible one. A donation from a donor who is not permissible, or who cannot be identified, must be returned within thirty days of receipt. Donations above the reporting threshold are reported to the Electoral Commission in the party's quarterly return. Those duties belong to the Treasurer. They are not delegated to fundraisers, advisers or consultants, and they cannot be.
68. Within Reform UK those duties are discharged by the Treasury function. No donation is treated as accepted until the identity of the donor has been established, permissibility has been confirmed against the statutory categories and, where the size or circumstances of the donation call for it, the source of the funds has been examined. Funds which do not satisfy those checks are returned. The leader of the party takes no part in that process and does not discuss amounts or mechanics with prospective donors.
69. The people who deal with prospective supporters, whether staff, advisers or contractors, have no authority to accept a donation and no role in deciding whether one is permissible. Their function is to build the relationship and, when a contribution becomes concrete, to pass it to Treasury. What they say to a prospective supporter about how a donation might be made does not commit the party to anything. A donation the party has not received cannot be accepted by it, and a donation Treasury has not checked cannot be accepted by anyone.
70. That division of responsibility is the background to everything said to Lockwood about the proposed contribution. It is also the background to the first of the investigation's recommendations, which concerns the point at which a prospective supporter is referred to Treasury, because in this case that point was never reached.

How the proposal arose

71. From the spring of 2026 Lockwood began to speak of the possibility of formal support from his father. On 9 June he wrote to Mr Orr:

"My father was very energised when I spoke to him today - he is increasingly minded to move forward with formal support, which is exciting."
72. In the same message he offered to meet the cost of one of the two polls then under discussion. Mr Orr's message of 8 July, set out below, was written in response to that prospect.
73. Mr Jukes met Lockwood on four occasions, three of them lasting between twenty and thirty minutes: for drinks on 13 April, at the Westminster Arms on 19 May, at a party dinner on 8 June and at lunch in Clacton on 28 July. There was also contact between them by message, some 130 messages in all.

74. It is of interest that on 8 June the actor (not Mr Jukes) turned on disappearing messages in that exchange. Mr Jukes had first heard of Lockwood from Mr Orr, and it was Mr Orr who passed Mr Jukes's details to Lockwood; Lockwood then made contact with him, and not the other way round. What he had been told was that Lockwood was wealthy, keen to help the party, had already given £5,000 to the Centre for a Better Britain and had paid for polling. He assumed, on that basis, that the necessary checks on him had been done. That assumption was wrong, and the recommendations address it.
75. His evidence is that the figure of £500,000 was introduced by Lockwood, and that Lockwood, as the programme itself shows, pressed on four separate occasions in three weeks for a meeting with Mr Farage. The recording of 19 May bears that out. Asked by Mr Jukes what figure was on the table, Lockwood replied:

"So I think five, 500 would be a realistic first salvo."

76. The figure was his.

The meeting of 19 May

77. At that meeting Lockwood said that the American company through which the polls had been paid for would, for the time being, confine them to polling.
78. Mr Jukes replied: *"Are you happy to carry on with that?"* In the exchange that followed Mr Jukes said: *"You do realise that you can do it?"* and *"Actually that kind of does strike me as a solution."* He went on to refer to supporters of the party who, he said, had given through their children.
79. Mr Jukes's account of that conversation is that he was speaking to make a prospective supporter feel comfortable, that he had no authority to settle any arrangement and did not purport to, that he did not know the ownership of the family's funds and did not attempt to determine it, and that he expected the party's Treasury and its lawyers to deal with permissibility if a donation were ever presented in the usual way. He did not refer the matter to Treasury, and that his expectation that others would do so was not communicated to Lockwood.
80. Mr Jukes does not stand behind the references to supporters giving through their children as a description of any real arrangement. He says he simply invented circumstances for the purposes of not derailing the conversation and relationship but had no ability or inclination to convert the relationship. He told the investigation that this was *"foolish, loose talk"* which he regrets, that by that stage his guard was down, that he had never received any training on donations or compliance, and that he had no access to the party's financial information.
81. The investigation has found no basis for the suggestion that any supporter of the party has given in the way described.
82. His understanding of the source of funds, as he describes it, was of a private family office in the United Kingdom capable of making a permissible contribution. He knew

the father to be American and did not regard that as unusual; a family office in this country with an American member is not. The father, he had been told, did not wish to be publicly associated with the party, which he describes as not uncommon among the party's supporters. The investigation records that as his understanding. It does not adopt it as a description of what he had been told, since the recording shows that the constraint of the American company had been raised with him at the same meeting.

83. What the investigation does accept is that Mr Jukes did not regard himself as the person who would determine whether any donation could be accepted, and that he was right not to.

Mr Orr's message of 8 July and the meeting of 9 July

84. At Brown's the following evening Mr Orr said:

"It's your name. You're the donor. Your father has got deniability. In fact, your family office has got deniability. It's just you as an individual."

85. Lockwood replied:

"So, leave it to us to figure out, you know, how the money gets from Dad to me. You don't need to know about that."

Mr Orr answered:

"We do, we need to know a bit. We do like a standard vetting on this. Source of funds, all that."

86. Mr Orr's explanation of the word deniability is that it referred throughout to the father's reputational concern, which had been part of the account given to him since the first lunch in October: a father nervous of being associated with the party could say, if asked, that the giving was his son's.
87. The investigation accepts that explanation. It is consistent with what Mr Orr had been told for nine months, and it is consistent with what he said next, which was that the party would need to know the source of the funds and would check it. When Lockwood proposed that the party need not know how the money reached him, Mr Orr said that it would.

What was and was not agreed

88. Nothing was agreed. No donation was made. No donation was presented to the party. No donation was accepted. The party's procedures for verifying the identity of a donor and the source of funds did not engage, because nothing reached them. Lockwood himself, at the lunch on 28 July, said that

"There'll be some conversations, you know, necessarily lawyers, back office and so on"

before any money was available. That was the position on both sides. A contribution was in prospect; checks would follow; nothing had happened.

89. The investigation makes no finding that any arrangement to route the father's money through the son was agreed, because none was. What the material shows is a figure introduced by the actor, a route floated in conversation by Mr Jukes and by the actor, a meeting sought repeatedly by the actor, and references on both sides to the checks that remained to be done.
90. Whether money passing from a parent to an adult child becomes the child's own, or remains the parent's, is a question of fact which the party's procedures exist to determine. It never arose.

5. The meetings of 27 and 28 July

27 July

91. On the evening of 27 July Mr Orr met Lockwood and the man presented as his father at Mosimann's. The meeting lasted about an hour. Mr Orr thanked the father for his support and spoke in general terms of what the party might do with it. His account is that he had been given to understand that a donation was in train and that the necessary checks were being done by others, and that he had no involvement in either.
92. Mr Orr's evidence is that it was at this meeting that he first appreciated that the father was presenting as American. He raised it with Lockwood as they left and was told that Lockwood's mother was English and that he had been brought up and educated in Britain. He did not raise it with anyone in the party. That is dealt with in the section of this report on conduct and in the recommendations.
93. On parting, Mr Orr told Lockwood that Mr Farage was:
- "aware of the support but he doesn't go into the weeds on the numbers".*
94. His explanation is that Mr Farage does not discuss amounts or mechanics with prospective donors and had not done so here, and that he was describing a practice rather than a state of knowledge. The investigation accepts that explanation. It is consistent with what Mr Orr says he had told Mr Farage, which was that a family office was in prospect as a significant supporter, and nothing about who the family was or how the polls had been paid for.
95. It is likewise consistent with all accounts of how donations are managed by the Treasurer and categorically not Mr Farage.

28 July

96. The lunch in Clacton on 28 July was arranged by Mr Jukes at Lockwood's repeated request. Mr Farage was in the middle of a by-election in which he was the candidate. Lockwood had approached Mr Jukes four times in three weeks to arrange it, while Mr Farage was occupied with the campaign. Mr Jukes's evidence is that he told Mr Farage beforehand that the visitors were prospective donors who wished to give to the party and whom he ought to meet. He did not tell him about the polls or how they had been

paid for. His account of the lunch is that it lasted about two hours, ranged from British politics to Shakespeare, and that he himself said nothing about donations.

97. At the lunch the man presented as the father said:

“I run an American Family office and I haven’t been able to donate directly up to this point, but I was thrilled to be able to pick up the tab for the polls that you had commissioned.”

98. Mr Farage said: *“Yeah, that was great.”*

99. The father referred to the poll on the front page of The Times and said, *“It was £30,000.”*

100. Mr Farage said *“Amazing”* and, of the polls, *“bang for the buck”* and *“a relatively modest investment”*.

101. Lockwood then said: *“I’m going to be the, it’ll be me. I’ll be the registered donor. And so I think there’ll be some conversations, you know, necessarily lawyers, back office and so on. But then dad will send the money to me and then as soon as that’s done, all of those conversations are had, then the money’s available.”*

102. Mr Farage said: *“Thank you. Both of you.”*

103. The investigation does not make findings about what was in anyone’s mind. It makes findings about what the material shows, and the material shows the following:

104. Nothing in it indicates that the arrangements for paying for the polls had been explained to Mr Farage at any time before that lunch. The accounts of the two people who dealt with him, Mr Orr and Mr Jukes, are to the same effect.

105. The information that an American had paid for the polls was put to him for the first time across a restaurant table, by a man he had just met, during a by-election campaign, in the course of a two hour conversation that ranged from British politics to Shakespeare, to someone whose role has been explained does not include discussing the amounts or mechanics of donations with prospective donors and who is not responsible in the organisation for checking the permissibility or otherwise of a potential contribution.

106. His responses were the responses of a host to a guest. The proposed contribution was described to him by the visitors themselves as subject to *“lawyers, back office and so on”* before any money would be available, and he was thanked for nothing more than his time.

107. The investigation is conscious that the exchange has been broadcast and that the words *“that was great”* and *“amazing”* have been widely repeated. They were said. They were said in response to a stranger’s remark about a matter of which the material shows no prior explanation to him, and they are the words one says to a guest. They are not evidence that Mr Farage knew how three polls had been paid for six months earlier, and the investigation has found nothing else that is.

108. In any case, the exchange does not alter the salient fact that the polls in question were not commissioned by Reform UK as set out above, and therefore the payment of which did not constitute a donation to the party.

6. The broadcast

109. The programme ran for twenty-eight minutes and drew on recordings made over eleven months. The investigation does not question the accuracy of the recordings, and it does not speculate about the intentions of those who assembled them. It records what the assembly does to the meaning of what was said.
110. The programme opened by placing three remarks together:
- (1) Mr Orr at Claridge's in March, saying of a proposal that "*it would technically be a donation*" and asking whether anyone would find out;
 - (2) Mr Jukes at Brown's in April, describing "*little clandestine projects*"; and
 - (3) Mr Farage in Clacton in July, saying "*a relatively modest investment*".
111. Those were three conversations, in three places, four months apart, about three different things. The first concerned a proposal that was abandoned. The second concerned polls that had been published. The third concerned a remark made **to** Mr Farage by a stranger. Placed in sequence, with a narrator's statement that "*what you're about to watch is a plot to break the law on party funding at the highest levels of Reform UK*", they present as a single scheme. They were not.
112. The Claridge's remarks were shown immediately after the narrator's account of the first poll, and were introduced with the words:
- "Orr wants to do more polling. This scheme doesn't come off but it's nearly identical to the poll that Orr got William's dad to pay for."*
113. The programme thus acknowledged that the proposal under discussion was not pursued and then used Mr Orr's words about it as if they described the payments that were made. Mr Orr's own words at the same meeting, that the proposal "*would technically be a donation in kind*", are the reason it was not pursued.
114. Mr Orr's remark of 12 January, that Mr Farage "*won't know, doesn't know and won't know*", was placed against the meeting of 28 July, six months later, with the question: "*Well, is that true?*" The remark in January concerned the leader's practice of not involving himself in funding mechanics.
115. The lunch in July was the occasion on which visitors told Mr Farage about the polls. A statement in January that a person does not know something is not falsified by his being told it in July.
116. The narrator stated that the proposal for the father's money to reach the party through the son was "*suggested not by the undercover team, but by Reform UK's senior*

officials". On the recording of 19 May, it was Lockwood who introduced the constraint of the American company and Lockwood who introduced the figure. Mr Jukes's remarks in that conversation are criticised in this report. The origin of the proposal was not his.

117. The remark of 24 February about a lunch with Mr Farage was presented under the heading of buying a meeting. The remark was that a prospective donor of a substantial sum would be thanked by the leader over lunch. That is the practice of every party. It is not an offer of anything in return, and Mr Farage's stated position at every such meeting is that there are no arrangements and no reciprocity. The words used were unwise and the section on conduct says so. They were not a price.
118. The programme did not show the proposals that were dropped in October, November and February, or the message of 8 July warning of the very restrictions that would have prevented the donation. It did include the acknowledgment that some proposals were abandoned over legality, and Mr Orr's reference to vetting and the source of funds. The investigation records both. The omissions it records are of the material that would have shown a pattern of stopping, in a programme whose subject was a pattern of proceeding.
119. Finally, the actor was not a passive observer. He offered money, paid it, asked what more he could do, proposed sums, sought meetings and, when a father was required, supplied one. On 20 January he wrote to Mr Orr: "*Main point from my side is: we have the green light on both parts of the proposal. So we can proceed immediately.*" On 19 January: "*Shall we chat later today / this evening about next steps? We're keen to proceed.*" On 14 July of the meeting with Mr Farage: "*Dad is very keen on the idea, and I'm wondering if I should block off some time on his agenda.*" On 8 June, the day of the party dinner, he turned on disappearing messages in his exchange with Mr Jukes. The transactions the programme presents as the party's were funded, pressed for and, in the case of the proposed contribution, proposed by the operation itself.

7. Assessment

The framework

120. Under the Political Parties, Elections and Referendums Act 2000, a donation to a registered party includes a gift of money or property to the party; sponsorship, meaning money provided to the party or to another person for the party's benefit to meet expenses of research or events organised by or on behalf of the party; money spent by another in paying expenses incurred by the party; and the provision to the party, otherwise than on commercial terms, of property, services or facilities for its use or benefit. A party must not accept a donation from a person who is not a permissible donor, and a donation it is prohibited from accepting must be returned within thirty days of receipt. Donations above the reporting threshold are reported quarterly. It is an offence knowingly to enter into, or to act in furtherance of, an arrangement which facilitates the making of donations to a party by an impermissible donor.

The polls

121. The question is not whether the polls were useful to the party. They were. The question is whether anything falling within the statutory definition of a donation was provided to it. On the findings in this report, nothing was provided that could constitute a donation. The party incurred no expense, so none was discharged by another. No polling or research was organised by or on behalf of the party, so none was sponsored. Nothing was provided to the party: the findings and the tables were published, and the party received them as the public did, when the public did.
122. The Electoral Commission has itself applied that analysis. In 2018, examining polling paid for by a European political party on subjects and in areas of strategic significance to the UK Independence Party, the Commission found that the polling could have been of benefit to UKIP had it been provided, but that the evidence did not establish that it was commissioned for UKIP's benefit or that UKIP received it, and concluded that it was not a donation. The relevance of a poll to a party's interests, and the party's pleasure at its results, were not enough. The same distinction applies here.
123. It follows that no donation was received, none fell to be returned and none fell to be reported. The investigation notes that the pre-broadcast correspondence asserted a duty to report each payment to the Commission within thirty days of the payment. There is no such duty. The thirty-day period is the period within which a prohibited donation must be returned; reporting is quarterly. The point does not arise, because there was no donation, but the premise of the allegation as put was wrong in law.

The proposed contribution

124. No donation was ever made or received. The remaining question is whether anyone knowingly entered into, or acted in furtherance of, an arrangement to facilitate an impermissible donation. That requires an arrangement.
125. The investigation has found none. It has found a figure introduced by the actor, a route referred to in conversation, a meeting pressed for by the actor and granted, and repeated references on both sides to the checks that would have to be carried out before anything happened. It has found no agreement as to what would be done, by whom, or when, and no step taken by anyone at the party in furtherance of anything.
126. The investigation has found that the people who spoke to the actor understood that permissibility would be determined by the party's procedures and not by them, and that when the actor suggested the party need not know how the money had reached him, he was told that it would.
127. The courts have recognised that a party officer who discusses with persons presenting as prospective donors the routes by which a lawful donation might be made, with compliance as a stated condition, is not thereby shown to be willing to break the law. That was the conclusion in *Cruddas v Calvert*, in which the High Court and the Court of Appeal found that a newspaper had failed by a wide margin to justify an allegation of that kind, attaching particular importance to the officer's insistence that the party's compliance staff would have to be consulted. The investigation does not suggest that

the facts here are identical. The principle is the same, and it applies with particular force where the persons said to be facilitating a donation had themselves, in writing and on the recording, referred the question of permissibility to the party's checks.

The individuals

128. The investigation has found no evidence that Mr Orr or Mr Jukes knowingly entered into or acted in furtherance of an arrangement to facilitate an impermissible donation. Both understood the polling arrangements to be lawful, for reasons this report has set out and which the investigation considers were sound.
129. Both understood that any donation would be subject to the party's checks. Where Mr Orr doubted whether a proposal was lawful, he stopped. Where Mr Jukes spoke beyond his knowledge, he was wrong to do so and this report says so. Neither did anything that constitutes a breach of the law.

The source of the payments

130. The money that paid for the polls came from a company set up and controlled by Verbatim. The American whose money it was represented to be did not exist. The investigation makes no finding about the position of any person outside the party, which is a matter for the bodies now examining it. It records only that, on the broadcasters' own account of what the payments were, the arrangements by which they were made were devised, funded and carried out by the operation, and that the persons at the party who are said to have facilitated them were the persons the operation deceived and if anyone should be investigated for knowingly furthering an arrangement it is Verbatim and consideration should be given whether they have committed the offence they are seeking to invoke.

8. Conduct

131. The investigation has reached clear conclusions about the legal position. Those conclusions do not dispose of the question of how these matters were spoken about, and it would be worthless to pretend otherwise. But the remarks have to be read in the circumstances in which they were made, and the first of those circumstances is where the demand for discretion came from.

Where the discretion came from

132. It came from the actor. On 27 October 2025, before any poll had been mentioned, he wrote:

"please do treat this with utmost discretion. We prioritize confidentiality in our business."

133. The account he gave from the first lunch onwards was of a father who wished to help but who would not be publicly associated with the party, and of a son looking for ways to support the wider cause lawfully without his family's name appearing on a register. Everything that followed was shaped by that request.

134. When Mr Orr told Lockwood in November that a person either donates and is declared or does not donate, the question that remained was what a person in Lockwood's position could lawfully do, and the answer arrived at was that he could pay for published research which anyone could read, which did not make him a donor, and which therefore did not require his name to be published. That is a lawful answer to a lawful wish. There is nothing improper in a supporter of a cause preferring not to be identified with it, and nothing improper in explaining to him that he can do without being.
135. Much of the language of confidentiality in the recordings is about that. When Mr Orr said, on 12 January, that he would not breathe a word of it to anybody, his explanation, which the investigation accepts, is that he was assuring Lockwood that the party would not identify him as a supporter, and that Lockwood would not need to identify himself as one, because he was not one.
136. When he said the same day that Mr Farage "*won't know, doesn't know and won't know. It's the kind of thing he doesn't want... he would rather not know*", he was describing two things at once: the leader's settled practice of keeping out of funding mechanics, and the fact that a person who did not wish to be seen as a supporter of the party would not be presented to its leader as one.
137. When Mr Jukes described the relationship with the pollster as discreet, and the polling as not showing up in public records, he was describing an arrangement in which the supporter's name did not appear. His own account of the phrase "*off the books*" is that it referred to the poll standing as JL Partners' own on the industry record rather than being attributed to a client, and of "*clandestine*" that he used it to mean no more than private. The investigation does not treat any of those remarks as evidence of an intention to conceal something that the law required to be disclosed, because on its findings there was nothing that the law required to be disclosed.

Where the language went wrong

138. That is where the tempering ends. A lawful wish for privacy explains why confidentiality was being discussed. It does not explain, and it does not excuse, the way in which some of it was discussed.
139. On 31 March 2026, at Claridge's, discussing a further proposal, Mr Orr said: "*If there's anyway of seeing it, it would technically be a donation in kind. Is anybody going to find out? Am I going to tell anyone? Obviously not. So, the reality is we can easily get away with it.*" He went on to make an extended joke about brown envelopes and chalk marks on post-boxes. The proposal was not pursued, and the reason it was not pursued is in his own first sentence: he thought it would be a donation in kind. Having reached that view, the only proper thing to say about it was that it would have to be declared or it could not be done. To say instead that nobody would find out was wrong. It was wrong even though it was said in the course of a discussion that ended with the proposal being dropped, and even though the person he was speaking to had asked for discretion. Privacy for a supporter is one thing. Whether a declarable donation is declared is not a matter of privacy at all, and the remark treated it as if it were.

140. At the same meeting Mr Orr spoke of the Electoral Commission in extremely condescending terms. The Electoral Commission is the body Parliament has charged with the supervision of political finance. An officer of a political party who speaks of it in those terms, to a person he believes to be a prospective supporter, does damage to public confidence in the system of regulation that goes well beyond his own position. They were wrong when they were made and they are not mitigated by the fact that the proposal under discussion was abandoned.
141. On 16 January, in a message about how an invoice would be settled, Mr Orr wrote: *"Whatever works to keep it arms length from us."* The investigation has found that the liability was not the party's and that keeping the party out of a transaction that was not its own was the correct outcome. The phrase was nonetheless a poor one, because it describes a proper result in the vocabulary of avoidance, and it was that vocabulary which gave the programme its material.
142. On 13 April, at Brown's, Mr Jukes said that the polling arrangements were *"an amazing, sweet spot, relatively good value for money, make a huge impact and they don't show up anywhere in public records"*, that the relationship with the pollster was *"a really really discreet"* one, and that *"those little clandestine projects are so valuable for the sake of four and a half grand"*. At a party reception the same evening he introduced Lockwood to guests as a *"key donor for an off-the-book project"*. The investigation has set out above why discretion about the supporter's identity was lawful and was his to ask for. That is not what those words convey. To call a lawful and published arrangement clandestine and off the book is to invite the inference that it was neither lawful nor published, and to describe a man as a donor to an off-the-book project, at a party event, to people who had no idea who he was, was to say something about the party that was not true and that the party has had to answer for. Words like those, spoken about arrangements that could have been described accurately in a sentence, are the reason a lawful arrangement could be presented as a plot.
143. On 19 May, at the Westminster Arms, Mr Jukes said of a route by which a father's money might reach the party through his son: *"It's the father and it's the son. So that's one of the ways in which we do it"* and referred to supporters who he said had given in that way. This is the most serious of the remarks and no circumstance tempers it.
144. However, the investigation has found no basis for the suggestion that any supporter of the party has given in the way described.
145. Mr Jukes's evidence is that he was speaking to reassure a prospective supporter, that he was speaking beyond his knowledge and invented the occurrence of such events to impress the donor and not seem disagreeable. He told the investigation that it was *"foolish, loose talk"* and that he regrets it. That explanation is accepted as an explanation only. It is not a defence. To offer a prospective donor an assurance about how other people's money has reached the party, when one does not know it to be true, is a serious thing to do. There are potential consequences in naming individuals who have done nothing wrong and in making the suggestion that they have notwithstanding that the individual's identities were not broadcast.

146. At the same meeting he said: *“I’m happy to take a £5 million personal unconditional gift, of course. I know a guy”*, and: *“If Nigel makes it to Number 10, you’re having a pint with who’s effectively going to be chief of staff in Number 10. If that isn’t a business interest, I don’t know what it is.”* On 24 February Mr Orr had said: *“I guess if there’s a non-trivial chance of you guys directly giving a seven figure, well sorry, let’s say five figure, five or six figure sum, then we could do a lunch with Nigel.”* The party’s practice, and Mr Farage’s own stated position at every such meeting, is that there are no arrangements, no undertakings and no reciprocity, and a leader thanking a significant supporter over a meal is the practice of every party. That practice is not altered by any of these remarks. But a form of words capable of being understood as an offer of access in exchange for money should never be used by anyone speaking for the party, whatever was meant by it, and the first of them was a joke that should not have been made.
147. On 27 July Mr Orr formed the view that the man presented as Lockwood’s father was American, and raised it with Lockwood, but did not raise it with anyone in the party before the leader met the same man the following day. He should have. Whatever the answer would have been, the question was one for the party’s Treasury and not for a conversation on the pavement. And Mr Jukes agreeing to be a paid guest speaker in his own capacity for a supplier with which he was placing work connected to the party, whether or not on his own account, put himself in a position which called for disclosure to the party and a record of it. The recommendations address both.

The proper criticism

148. The criticism the investigation makes is narrower than the allegation but it is real, and it is of two kinds. The first is of language. A supporter’s lawful wish for privacy was allowed to colour the way lawful arrangements were described, until they were being spoken of in the vocabulary of concealment by people who had nothing to conceal. That vocabulary did more damage to the party than any transaction, and it was avoidable. The second is of candour. A prospective supporter was told things that were not known to be true, about how others had given and about what could be done, in order to keep him engaged. That is a failure of judgment which no request for discretion explains, and it is not answered by the fact that the transactions themselves were lawful.

9. Recommendations

149. The investigation’s recommendations follow from its findings. Each is directed at a specific failure the material disclosed.

Referral of prospective donors

150. A proposed contribution of £500,000 was discussed for two months, and a meeting with the party leader was arranged for the person proposing it, without anyone notifying the party’s Treasury. On the evening before that meeting an officer learned something that bore directly on permissibility and did not pass it on. The party should adopt a written rule that once a prospective contribution becomes concrete, meaning

that a figure has been mentioned, a timescale discussed or a meeting with a senior figure sought, the person managing the relationship must notify a named Treasury officer in writing and receive written acknowledgment; that no meeting between a prospective donor and the party leader or deputy leader takes place until Treasury has confirmed that preliminary checks on identity and source of funds have been carried out; and that any information bearing on the identity, residence or source of funds of a prospective donor is passed to Treasury on the day it is learned.

Commissioning of research by persons connected with the party

151. The polls in this case were commissioned by a contractor on his own account, and the cost was met by third parties. The party should require that any person engaged by it who commissions research, polling or analysis bearing on the party's interests records in writing, before the work is placed, the capacity in which it is commissioned, the client, the person liable for the cost and the intended funder, and lodges that record with Treasury. Where research is commissioned for the party's own use, it is to be treated as party expenditure and, if funded by another, as a donation in kind to be declared. Where a person engaged by the party commissions published research on his own account, the party should have no part in finding a funder for it.

Engagement of contractors

152. Mr Jukes was engaged by the party as a consultant and also worked for other clients, one of which was a supplier the party's work touched. That is a normal way for a political consultant to work, and the party benefits from engaging people with experience beyond its own operation. The difficulty in this case was not that he had other clients but that the party did not keep a contemporaneous written record, in relation to the polls, in which capacity he was acting or that the supplier concerned was one with which he had an independent relationship.
153. The party should ask contractors, at the point of engagement and thereafter as circumstances change, to tell it of any other client or supplier relationship that may bear on work they do for the party and should keep a record of what it is told. Where a contractor proposes to place work with a supplier with which he has such a relationship, he should say so to the party beforehand so that the party can decide whether the arrangement is one it is content with. The purpose is not to restrict who contractors may work for, but to ensure that the party is never again in the position of learning from a broadcast what it should have learned from its own records.

Conduct in dealings with prospective donors

154. Several of the remarks set out in this report were made to reassure a prospective supporter and were not true. Mr Jukes told the investigation that he had never received any training on donations or compliance. The party should issue written guidance to every person who deals with prospective donors on its behalf, whether employed or engaged, which states that no assurance is to be given about the way in which other people have supported the party; that no arrangement is to be described as discreet, off the record, or outside public view; that the regulator is not to be disparaged; that

the party's procedures for checking donors are to be described to every prospective donor at the outset; and that any doubt about the permissibility of a proposed contribution is to be referred to Treasury and not resolved in conversation. Attendance at that guidance should be a condition of engagement.

Unsolicited approaches

155. The operation succeeded because a person who had given money to a related organisation was thereafter treated as known. Mr Jukes's evidence is that, by the time he was introduced, he presumed the necessary checks had been carried out, because Lockwood had given to the Centre for a Better Britain and had paid for polling; no one had carried them out. The party should adopt a procedure under which any person who approaches an officer or contractor of the party offering support above the reporting threshold is subject to basic identity verification before being introduced to any senior figure and should be directed to the Treasury, and under which a record of the approach and of the verification carried out is kept by Treasury.

Implementation

156. The party should adopt each of these recommendations, assign responsibility for each to a named officer, and report confirmation within three months of the date of this report that it has done so.

10. Conclusions

157. For almost a year an actor using a false name, a false family and, eventually, a hired another actor, offered money to people connected with Reform UK and asked them how it might be given. He paid for three polls that a contractor to the party had commissioned and published. He proposed a large donation, named the figure, pressed for a meeting with the party leader and was granted one. He then broadcast the results.
158. Reform UK did not commission the polls, did not pay for them and received nothing from them that was not published. No donation was made to it, none was accepted by it and none fell to be reported. The proposed contribution was never made or presented. The party's procedures for checking donors were never reached. The investigation has found no breach of electoral law by the party, and no evidence that any individual knowingly took part in an arrangement to facilitate a donation from an impermissible source.
159. It has found that people speaking for the party said things that were wrong, careless and in one instance untrue, and that they said them because they had stopped attending to the difference between what the law permitted and what merely felt discreet. It has said so, and it has quoted them.
160. It has also found that the party's arrangements allowed a sustained deception to reach its leader without anyone asking the questions that would have exposed it, and it has set out the changes that will prevent that from happening again.

161. The party will implement those changes and will say publicly when it has done so.